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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 KEITH PAUL, an Individual,
10 Plaintiff,
11 vs.
12 CITY OF HENDERSON, DOES I -X; ROE
13 CORPORATIONS I -X,
14 Defendant.

CASE NO.: 2:19-cv-00996-GMN-DJA

STIPULATION AND ORDER FOR
DISMISSAL

14 Plaintiff Keith Paul (“Plaintiff”), by and through his attorneys, JENNY L. FOLEY,
15 Ph.D., ESQ., and MARTA D. KURSHUMOVA, ESQ. of the law firm HKM EMPLOYMENT
16 ATTORNEYS LLP, and Defendant City of Henderson, by and through its attorney, BRIAN R.
17 REEVE, ESQ. and KRISTINA E. GILMORE, ESQ. of the CITY OF HENDERSON CITY
18 ATTORNEY’S OFFICE, hereby stipulate and agree that, consistent with the requirements of
19 F.R.C.P. 41(a)(1)(A)(ii), this matter shall be Dismissed with Prejudice as to the First
20 (Discrimination, Retaliation and Wrongful Termination in Violation of the National Labor
21 Relations Act of 1935), Second (Retaliatory Discharge in Violation of Public Policy and NRS
22 614.090) and Third (Retaliatory Discharge in Violation of NRS 288.270) Causes of Action.
23 The Parties stipulate and agree that the Fourth Cause of Action (Defamation) shall be Dismissed
24 without Prejudice. The Parties stipulate and agree that each party shall bear its own attorney’s

1 fees and costs. In light of the parties' stipulation to dismiss this case, the parties respectfully
2 request that the Early Neutral Evaluation scheduled for October 3, 2019, be vacated.

3 Dated: September 24, 2019
4

5 CITY OF HENDERSON

6 By: /s/ Brian R. Reeve
7 BRIAN R. REEVE (#10197)
8 Assistant City Attorney
9 KRISTINA E. GILMORE (#11564)
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16 *Attorneys for Defendant*

17 Dated: September 24, 2019
18

19 HKM EMPLOYMENT ATTORNEYS LLP

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Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:

21 Dated: _____, 2019
22

23 _____
24 United States District Court Judge